IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC. d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,	)	CIVIL DIVISION
	)	No.: 00-CV-2041
Plaintiff,	)	
	)	JUDGE WILLIAM L. STANDISH
v.	)	
PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES VON BERNUTH, JOHN HERKLOTZ, an individual,	)	
Defendants.	)	

CONSENT MOTION TO EXTEND DISCOVERY

AND NOW, comes Defendant, JOHN HERKLOTZ, by his attorneys, John P. Sieminski, Esquire, and Burns, White & Hickton, LLC, and files this Consent Motion to Extend Discovery, of which the following is a statement:

1. Discovery in this matter is currently set to close on Friday, December 9, 2005.

2. On November 3, 2005, this Defendant filed a Motion to Compel Discovery. As a result of discovery proceedings that have occurred since the Motion to Compel Discovery was filed, that Motion has now become moot and Defendant Herklotz hereby withdraws the Motion to Compel Discovery without prejudice.

3. The parties desire an extension of the discovery deadline, with respective extensions of all additional pretrial and trial dates, in order to allow the discovery process to be completed.

4. All counsel have been consulted with respect to this Motion and all have consented to its filing. With the winter holiday period looming, the parties respectfully request that the discovery deadline be extended to January 31, 2006, with the other dates extended accordingly pursuant to the form of order attached.

WHEREFORE, Defendant, JOHN HERKLOTZ, requests that this Honorable Court enter an Order extending the discovery deadline and all other pretrial dates.

Respectfully submitted,

BURNS, WHITE & HICKTON, LLC

By: *John P. Sieminski*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **Consent Motion to Extend Discovery** was served on counsel listed below by electronic mail on this 8th day of December, 2005:

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By: *John P. Sieminski*
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Attorneys for Defendant, John Herklotz